



## **MEMO ENDORSED**

**Muriel Goode-Trufant**  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**  
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VIA ECF

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

January 14, 2025 The application is X granted  
denied

Edgardo Ramos, U.S.D.J  
Dated: January 15, 2025  
New York, New York

*Re:*     *A.B., et al. v. N.Y.C. Dep't of Educ.*, 23-cv-6840 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs, and expenses associated with underlying administrative proceedings, as well as this federal action, under the fee-shifting provisions of the Individuals with Disabilities Education Act ("IDEA").

Pursuant to the Court's October 30, 2024 Order (ECF No. 17), I write, jointly with Plaintiffs, to respectfully provide the Court with a case status update, and to request that all pending deadlines in this matter be further stayed to February 17, 2025. As of the filing of this letter, the undersigned has completed their internal analysis of Plaintiffs' attorney billing records, and has recently submitted a request for settlement authority. Defendant anticipates that an initial settlement offer will be extended to Plaintiffs within the next three weeks.

In view of the foregoing, the parties respectfully request that the current stay of all pending deadlines in this case be extended from today, January 14, 2025 (*see* ECF No. 17) to February 17, 2025. This is the parties' third joint request for a stay of this matter. The Court granted the parties' previous requests on May 14, 2024 (ECF No. 15) and October 30, 2024 (ECF No. 17). The parties intend to use the requested extension to negotiate in good faith a potential settlement of Plaintiffs' fee claim. Counsel for the parties have previously settled similar IDEA fees-only actions, and are optimistic that this matter will follow the same course.

The parties additionally propose filing a further joint status letter on or before February 17, 2025, which either apprises the Court that this matter has settled in principle, or which alternatively proposes a briefing schedule to resolve Plaintiffs' fee claim.

The parties thank the Court for considering this submission and requests.

Respectfully submitted,

/s/ Eric Teszler

Eric Teszler, Esq  
Assistant Corporation Counsel

cc: All counsel of record (via ECF)